

## **Exhibit 48**

# **SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS**

Case No.: 4:22-md-03047-YGR  
MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

**Affidavit of Will Noble**

1. My name is Will Noble and I make this declaration based on my personal knowledge.
2. I received a Bachelors in Middle School Education in December 2002 from Morehead State University and received a Masters in Middle School Education in 2007 from Union College.
3. I have 22 years experience working in Pre-K-12 education.
4. I have been the director of technology at Breathitt County School District since July 2018.
5. Prior to this, I held the positions of Assistant Principal from 2013 to 2014 and Principal from 2014 to 2018 at Breathitt County School District.
6. In my position as the director of technology, I oversee the implementation and maintenance of multiple methods of attempting to prevent and/or limit students use of social media at school and on school issued devices.
7. As a district, we have used a webfilter (Lightspeed Filter) to limit students access to social media sites since at least 2015. This works to limit students access to social media both through the internet connection at school and on their school issued devices regardless of location. We have completely blocked Facebook, Instagram, and SnapChat for all students.
8. As a district, we also have used Google settings to prevent access to YouTube for grades PK – 1 and use moderate restrictions for YouTube materials for grades 2 – 12 which generally aligns with a restriction to materials rated for 13+.
9. Our technology department routinely receives requests to block various VPN sites that allow students to bypass our webfilter and access social media sites like Facebook, Instagram, TikTok, Snapchat, and YouTube.

10. The time that my staff has to spend on social media related impacts on students has substantially increased in the nearly 12 years that I have worked at Breathitt County Schools.

11. When I first started as the technology director in July 2018, we had 2 staff members (Adrian Hudson and Byron Johnson) who spent approximately 5% of their time or 120 minutes or 2 hours per week on social media related concerns. By 2020, we increased to 3 staff members (Aaron McIntosh, Adrian Hudson, and Byron Johnson) and the percentage of their time spent on social media related concerns had risen to around 10%. Now in 2025, they (Aaron McIntosh, Michael Strong, and Toby Noble) spend anywhere from 10 – 15% of their work time addressing social media issues.

12. Due to the increased amount of time that our staff has to spend addressing social media issues, we now have 3 staff members. Were it not for the social media issues, we would be able to get by with fewer staff members.

13. The time that my staff has to spend addressing social media impacts on students means that they have less time to dedicate to other aspects of their job. For example, managing network hardware, repairing students devices, account management, software deployment/management.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 15, 2025.



Will Noble